REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Preliminary Matter

Pursuant to a new Power of Attorney filed on July 20, 2005, Applicant appoints Osha·Liang LLP to represent Applicant in this case. Accordingly, please change the attorney docket number to **09428/184001** and send future communications to the address associated with customer number 22511.

Disposition of Claims

Claims 1-29 were pending in this application. Claims 1, 12, and 21 are independent. The remaining claims depend, directly or indirectly, from claims 1, 12, and 21. Claim 28 has been cancelled by this reply.

Claim Amendments

Claims 1, 12, and 21 have been amended by this reply to clarify that (i) the template file comprises an operating system command associated with the router, wherein the operating system command comprises a variable; and (ii) the variable is interpreted during the assembly of the configuration file. Support for these amendments may be found, for example, in Figures 2B and 3 (along with the associated text) as well as pages 20-21 of the instant specification. No new matter has been added by the aforementioned amendments.

Rejection(s) under 35 U.S.C. §102

Claims 21, 22, and 28 stand rejected under 35 U.S.C. §102 as being anticipated by U.S. Patent No. 6,286,038 ("Reichmeyer"). Claim 28 has been cancelled by this reply. Thus, this rejection is now moot with respect to claim 28. To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

The claims, as amended, are directed to a system for configuring a router. More specifically, the claims, as amended, are directed to generating configuring instructions from a template and then using the configuring instructions to configure the router. As recited in the amended claims, the template file includes operating system commands for the router (*i.e.,* commands that the router executes in order to set the configuration), where the operating system commands include at least one variable that is interpreted (*i.e.,* the variable is replaced with an actual value) to generate a command. (*See, e.g.,* Instant Specification, p. 20-21). Once the configuring instructions have been generated, the configuring instructions are communicated to the router. Upon receiving the instructions, the router executes the configuring instructions to set its configuration.

Turning to the rejection, in order to anticipate a claim, the prior art must teach or suggest every aspect of the claimed invention either explicitly or impliedly. The Applicant respectfully asserts that Reichmeyer does not teach or suggest every limitation of amended independent claim 21. Specifically, Reichmeyer fails to teach or suggest at least the following limitations of amended independent claim 21:

(i) Reichmeyer fails to teach or suggest a template file – At the outset the Applicant notes that Reichmeyer is silent with respect to a "template file." Moreover, the "configuration information" recited in Reichmeyer is not equivalent to a template file. Specifically, the configuration information discussed in Reichmeyer is merely a file that contains

configuration parameters for the router without any mention of including "operating system commands associated with the router" as recited in amended claim 21. (*See* Reichmeyer, col. 6, ll. 30-42). In addition, the "pre-configuration" information discussed in Reichmeyer is also not equivalent to the template file recited in amended claim 21. Specifically, pre-configuration information, as used in Reichmeyer, corresponds to device address information (and other similar information). (*See* Reichmeyer, col. 6, l. 55 – col. 7, l. 10). In view of the above, there is no teaching or suggestion of a template file as recited in the amended claim 21.

(ii) Reichmeyer fails to teach or suggest configuring instructions – Reichmeyer teaches generating configuration information, forwarding the configuration information to the router. At this point, the router constructs a configuration file using the configuration information. The router is then rebooted and configured using the aforementioned configuration file. (*See* Reichmeyer, col. 11, ll. 15-28). There is no indication in Reichmeyer of any configuration instructions that include "operating system commands" for the router. Rather, Reichmeyer is limited to including configuration parameters. In view of the above, Reichmeyer fails to teach or suggest configuring instructions as recited in amended independent claim 21.

(iii) Reichmeyer fails to teach or suggest interpreting a variable in the template file during the assembly of the configuring information – As discussed above, Reichmeyer fails to teach or suggest a template file as recited in claim 21. Thus, it follows that Reichmeyer does not teach or suggest interpreting a variable within the template file during the assembly/generation of the configuring information. In fact, Reichmeyer does not teach or suggest generating configuring instructions by interpreting any variable. Rather, Reichmeyer only teaches a mechanism for *gathering* configuration parameters, storing configuration parameters, and forwarding configuration parameters to the router. In view of the above,

Reichmeyer fails to teach or suggest configuring information as recited in amended independent claim 21.

In view of the above, Reichmeyer fails to teach or suggest the invention recited in amended independent claim 21. Thus, amended independent claim 21 is patentable over Reichmeyer, and dependent claim 22 is also patentable over Reichmeyer for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Rejection(s) under 35 U.S.C. §103

Claims 1-10, 12-19, 23-26, and 29 stand rejected under 35 U.S.C. §103 as being unpatentable over Reichmeyer in view of U.S. Patent No. 6,298,057 ("Guy"). To the extent that this rejection still applies to the amended claims, the rejection is respectfully traversed.

As discussed above, Reichmeyer does not teach or suggest all the limitations of amended independent claim 21. Further, amended independent claims 1 and 12 include limitations which are similar to the limitations in amended independent claim 21 that distinguish the amended independent claim 21 from Reichmeyer. Thus, Reichmeyer does not teach or suggest all limitations of the amended independent claim 1 or 12. Moreover, Guy does not teach that which Reichmeyer lacks. This is evidenced by the fact that Guy is only relied upon to teach "managing communication between the router and the network without disrupting communication between the router and the network." (*See* Office Action mailed April 21, 2005, p. 6). Thus, neither Reichmeyer nor Guy, whether viewed separately or in combination, teaches or suggests all limitations of the amended independent claim 1 or 12. Thus, amended independent claims 1 and 12 are patentable over Reichmeyer and Guy. Dependent claims are patentable over Reichmeyer

and Guy for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 11, 20, and 27 stand rejected under 35 U.S.C. §103 as being unpatentable over Reichmeyer and Guy in view of U.S. Patent No. 5,802,278 ("Isfled"). To the extent that this rejection still applies to the amended claims, the rejection is respectfully traversed.

Claims 11 and 20 depend from amended independent claim 1, and claim 27 depends from amended independent claim 21. As discussed above, neither Reichmeyer nor Guy teaches or suggests all limitations of the amended independent claims 1 and 21. Further, Isfled does not teach or suggest that which Reichmeyer and Guy lack. This is evidenced by the fact that Isfled is only relied upon to teach "configuring the router not to send address of nodes in the first network to other routers" (Office Action mailed April 21, 2005, p. 10). Thus, Reichmeyer, Guy, and Isfled, whether viewed separately or in combination, fail to teach or suggest all limitations of the amended independent claim 1 or 21. Therefore, amended independent claims 1 and 21 are patentable over Reichmeyer, Guy and Isfled. Dependent claims are patentable over Reichmeyer, Guy and Isfled for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 09428/184001).

Dated: August 29, 2005   Respectfully submitted,

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